



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE OFFICE

APPLICATION PROCESSING AND CALCULATIONS

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De Minimus Significant TV Permit Revision
Modification of a Conveyorized Coating Line
Permit to Construct (Section D)

Legal Owner

ID: 71797

or Operator: TED LEVINE DRUM CO
1817 CHICO AVE.
SOUTH EL MONTE, CA 91733

Equipment

Location: 1729 CHICO AVE., SOUTH EL MONTE, CA 91733

Equipment Description:

A/N 515544 (Title V Permit Revision)
De Minimus Significant TV Permit Revision

A/N 515541 (Modification, Class I, Previous PO No. F66256, A/N 404650)

MODIFICATION TO THE CONVEYORIZED COATING LINE, CONSISTING OF:

1. SPRAY BOOTH, 8'-0" W. X 7'-0" H. X 10'-0" D., WITH TWENTY 20" X 20" EXHAUST FILTERS, AND A 2 HP EXHAUST FAN.
2. DRYING TUNNEL.
3. AIR POLLUTION CONTROL SYSTEM CONSISTING OF:
 - A. THERMAL OXIDIZER, TELLKAMP SYSTEMS, HOT ROCK DUAL-BED TYPE, MODEL NO. 5, WITH NATURAL GAS INJECTION, ONE 700,000 BTU PER HOUR NATURAL GAS FIRED START-UP BURNER, 2,000,000 BTU PER HOUR MAXIMUM FIRING RATE.
 - B. EXHAUST SYSTEM WITH, ONE 25 H.P. EXHAUST FAN VENTING ONE SPRAY BOOTH, ONE DRYING TUNNEL, AND TWO DRUM/PAIL ACETONE WASHERS.

BY THE REMOVAL OF:

1. SPRAY BOOTH, 8'-0" W. X 7'-0" H. X 10'-0" D., WITH TWENTY 20" X 20" EXHAUST FILTERS, AND A 2 HP EXHAUST FAN.
2. DRYING TUNNEL.

AND THE ADDITION OF:

1. SPRAY BOOTH, 8'-0" W. X 7'-0" H. X 10'-0" D., WITH TWENTY 20 X 20 EXHAUST FILERS, PERMANENT TOTAL ENCLOSURE, AND A 2-HP EXHAUST FAN.
2. DRYING TUNNEL, 50'-0" L. X 8'-0" W. X 7'-0" (INTERNAL DIMENSIONS OF MAIN SECTION), PERMANENT TOTAL ENCLOSURE,



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WITH ONE 0.467 MMBTU/HR MAKEUP AIR HEATER, ECLIPSE, MODEL TA040.

History

Due to a recent fire, the permitted spray booth and drying tunnel were completely destroyed. The company has since shut down the coating operation and sent all reconditioned drums to outside contractors for painting.

On 10/19/2010, the company submitted the above applications, proposing the following:

1. Identical replacement of the destroyed paint booth.
2. Installing a new longer tunnel to replace the destroyed tunnel in order to further enhance drying of painted drums.

Ted Levine Drum operates a non-RECLAIM Title V facility at the above address. The company has been in constant operation at this location with a Title V permit since 2002. The company has been subject to both self reporting requirements and AQMD inspections. The facility has had no Notices to Comply or Notices of Violation issued during the last two years. The company is currently operating in compliance with District rules without any pending issues.

Process Description

In this facility, used drums are sandblasted, washed, and painted. The paint spray booth is used to capture PM emissions with dry filters and vent VOC emissions from spraying coating of the inside and outside of metal drums. Painted drums are then passing through a drying enclosure to promote complete curing of painted parts. VOC emissions from coating and drying are vented to an oxidizer.

Discussions

The applicant will continue to use the same types and quantities of coatings inside the coating line as already permitted, without requesting any increase in throughput. Therefore, VOC emission increases are not expected from the proposed project. The existing permit does not include the 0.467 mmbtu/hr burner. However, according to the applicant, the burner was installed when the system was modified in early 2000 by the installation of the drying tunnel and regenerative thermal oxidizer.



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Rule 1147 Compliance

The make-up air heater serving the drying tunnel is made by Eclipse, Model TA040, rated 467,000 BTU/hr, emitting about 90 ppm NO_x at 3% oxygen. The heater is operated at a temperature of 200 °F, and is subject to Rule 1147 NO_x limit of 30 ppm at 3% oxygen. Since the unit was manufactured in 2004, Rule 1147 compliance date will be 7-1-2019 for an in-use unit manufactured after 1997.

The burner serving the thermal oxidizer is operated at a temperature above 1500 °F, and is subject to Rule 1147 NO_x limit of 60 ppm at 3% oxygen. Since the burner and oxidizer were both installed in 2002, the Rule 1147 compliance date will be 7-1-2017, when the in-use unit turns 15 years old.

Combustion Emissions from Air Heater

The make-up air heater emits 90 ppmv NO_x at 3% O₂. Other criteria pollutant emission factors are taken from AP-42, section 1.4, revised 10/96.

The following equation is used to compute the hourly emissions:

Emissions of ith compound from the combustion of natural gas (lb/hr) =

$$\frac{\text{Max. Heat Input Rating } (10^6 \frac{\text{BTU}}{\text{hr}}) \cdot \text{Emission Factor of } i^{\text{th}} \text{ compound } (\frac{\text{lb}}{10^6 \text{ ft}^3})}{\text{Gross Heating Value } (\frac{\text{BTU}}{\text{ft}^3})}$$

Please see the attached Excel worksheets for detailed calculations. The following table summarizes the calculated results:

EMISSION SUMMARY
(lb/dy)

A/N	ROG	NO _x	SO _x	CO	PM ₁₀
515541	0.07	1.25	0.01	0.37	0.08

Rule 1401 Impact:

Target Organs	Acute	Chronic	Acute Pass/Fail	Chronic Pass/Fail
Alimentary system (liver) - AL		2.13E-07	Pass	Pass



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Bones and teeth - BN			Pass	Pass
Cardiovascular system - CV			Pass	Pass
Developmental - DEV	2.44E-06	1.17E-05	Pass	Pass
Endocrine system - END		2.13E-07	Pass	Pass
Eye	6.85E-03	2.27E-03	Pass	Pass
Hematopoietic system - HEM	2.00E-06	5.98E-06	Pass	Pass
Immune system - IMM	8.25E-05		Pass	Pass
Kidney - KID		2.13E-07	Pass	Pass
Nervous system - NS	4.40E-07	1.32E-05	Pass	Pass
Reproductive system - REP	2.44E-06		Pass	Pass
Respiratory system - RES	6.85E-03	3.03E-03	Pass	Pass
Skin			Pass	Pass

Compound	Residential	Commercial
Acetaldehyde	5.59E-10	1.09E-10
Acrolein		
Ammonia		
Benzene (including benzene from gasoline)	1.04E-08	2.03E-09
Ethyl benzene	1.07E-09	2.10E-10
Formaldehyde	4.64E-09	9.06E-10
Hexane (n-)		
Napthalene	4.68E-10	9.14E-11
PolyCyclic Aromatic Hydrocarbon (PAHs)	1.51E-07	1.45E-08
Propylene		
Toluene (methyl benzene)		
Xylenes (isomers and mixtures)		
Total MICRs	1.68E-07	1.78E-08
	PASS	PASS

EPA Method 204 (PTE) Evaluation

The booth and drying tunnel meets the criteria for a total enclosure as specified in EPA Method 204. This is based on the attached determination that was made by Tellkamp, the air pollution control equipment manufacturer:

The old PTE system was demonstrated to meet the requirement of EPA Method 204. The previous evaluation of the thermal oxidizer



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indicated that it has a residence time greater than the recommended 0.5 sec at 1400 oF. The thermal oxidizer was source tested in 2003 and was demonstrated to meet the minimum destruction efficiency of 95% (actual efficiency during the test was 99.4%). The replacement spray booth and new tunnel are expected to continue meeting all criteria specified in EPA Method 204 of being a permanent total enclosure (PTE). The operator is subject to a draft condition No. 8 to maintain the booth and tunnel as PTE. A source test will be required to be conducted within 180 days of issuing the permit to construct to demonstrate that the new tunnel, booth, and oxidizer can achieve a minimum of 95% overall control of VOC emissions (see draft condition No. 20).



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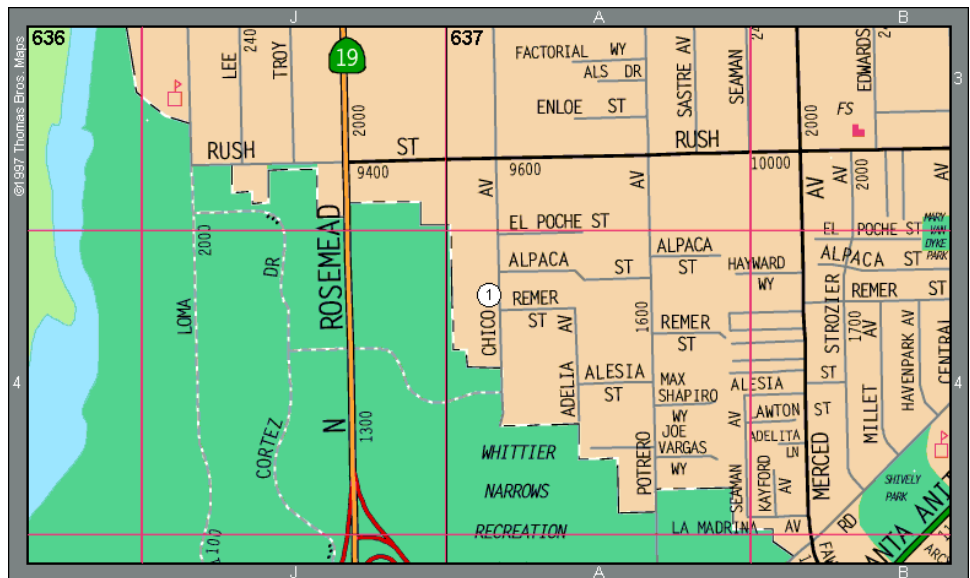
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Rule Evaluation

Rule 212(c)(1):

This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.



Since no school is located within 1,000 ft, this modification will not trigger a public notice.

Rule 212(c)(2):

This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

	MDC (lb/dy)					
	ROG	NO _x	PM ₁₀	SO ₂	CO	Pb
Entire Project	0.07	1.25	0.08	0.01	0.37	0
MAX Limit	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No

The above table summarizes the emission limits and increases. Since emission increases are less than the limits, a public notice will not be required per this section.

Rule 212(c)(3):

This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulted in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

This project will create negligible emission increases of toxic air contaminants. The resulting MICRs are less than 1E-6. Therefore, a



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public notice will not be required per this section.

Rule 212(g):

This section requires a public notice for all new or modified sources that have equipment emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The following table summarizes the limit and MDC:

	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Per Equipment	0.07	1.25	0.08	0.01	0.37	0
MAX MDC Limit (lb/dy)	30	40	30	60	220	3
Required Public Notice	Yes	No	No	No	No	No

Since the emission increase is less than the limits. The modification will not trigger the requirements for a public notice.

Rule 401:

Visible emissions are not expected with the proper operation of the equipment.

Rule 402:

Nuisance is not expected with the proper operation of the equipment.

Rule 1303(a):

The project is in compliance with BACT. Please see the BACT evaluation for more details.

Rule 1303(b)(1):

No further analysis is required since the emissions from the equipment is less than the screening levels in Table A-1 of the Rule:

Rating (BTU/hr)	MHC (lb/hr)					
	LIMIT			Estimated		
	<u>NO_x</u> (lb/hr) <u>Limit</u>	<u>CO</u> (lb/hr) <u>Limit</u>	<u>PM₁₀</u> (lb/hr) <u>Limit</u>	<u>NO_x</u> (lb/hr) <u>Calculated</u>	<u>CO</u> (lb/hr) <u>Calculated</u>	<u>PM₁₀</u> (lb/hr) <u>Calculated</u>
Non combustion	0.068	3.7	0.41			
<2	0.2	11.0	1.2	0.05	0.015	0
>2 <5	0.31	17.1	1.9			
>5 <10	0.47	25.9	2.8			
>10 <20	0.86	47.3	5.2			
>20 <30	1.26	69.3	7.6			
>30 <=40	1.31	72.1	7.9			



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Rule 1303(b)(2): The following emissions have been entered in the District AEIS and NSR:

	ROG	NO _x	PM ₁₀	SO ₂	CO
R1 (lb/hr)	18	1.27	.09	.02	.47
R2 (lb/hr)	1.8	1.27	.09	.02	.47

There is no ROG emission increases (the data entered was carried from the previous evaluation).

The facility's NO_x potential to emit is less than 4 tons per year. Therefore, NO_x external emission offsets are not required per Rule 1304(d)(2)(A).

Rule 1401: This project will result in negligible emission increases of toxic air contaminants. The calculated MICRS are less than 1E-6. The calculated HIAs and HICs are less than 1. Therefore, this project is expected to comply with this rule.

Regulation XXX Evaluation

Rule 3000(b)(6) defines a "de minimus significant permit revision" as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or HAPs from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

To determine if a project is considered as a "de minimus significant permit revision" for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from

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all permit revisions that are made after the issuance of the renewal Title V permit shall be accumulated and compared to the above threshold levels. This proposed project is the 3rd permit revision to the Title V renewal permit issued to this facility on 02-04-2007. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

	HAP	VOC	NOx	PM10	SOx	CO
1 st Permit Revision; addition of one 6.25 MMBTU/hr boiler, replacing one 5.3MMBTU/hr boiler, PC issued, A/N 474820	0	0	0	0	0	0
2 nd Permit Revision; PC to PO, A/N 474820	0	0	0	0	0	0
3 rd Permit Revision; Replacing Paint Spray Booth and Drying Tunnel	0	0	1	0	0	0
Cumulative Total	0	0	1	0	0	0
Maximum Daily	30	30	40	30	60	220

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a "de minimus significant permit revision" for non-RECLAIM pollutants or HAPs.



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Recommendation

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "de minimus significant permit revision", it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit with the following conditions will be issued to this facility:

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL BE IN FULL OPERATION WHENEVER ANY OF THE EQUIPMENT SERVED BY THIS APC SYSTEM IS IN OPERATION.
[RULE 1303(a)(1)-BACT]
4. A TEMPERATURE INDICATOR SHALL BE INSTALLED AND MAINTAINED TO MEASURE THE COMBUSTION CHAMBER TEMPERATURE IN THE THERMAL OXIDIZER.
[RULE 1303(a)(1)-BACT]
5. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE COMBUSTION CHAMBER TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,500 DEGREES FAHRENHEIT WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.

THE OPERATOR SHALL OPERATE AND MAINTAIN A TEMPERATURE MEASURING AND RECORDING SYSTEM TO CONTINUOUSLY MEASURE AND RECORD THE COMBUSTION CHAMBER TEMPERATURE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A COMBUSTION CHAMBER TEMPERATURE OF LESS THAN 1,500 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION OF THE EQUIPMENT IT SERVES. THE OPERATOR SHALL REVIEW THE RECORDS OF THE COMBUSTION CHAMBER TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.



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WHENEVER A DEVIATION OCCURS, THE OPERATOR SHALL INSPECT THIS EQUIPMENT TO IDENTIFY THE CAUSE OF SUCH A DEVIATION, TAKE IMMEDIATE CORRECTIVE ACTION TO MAINTAIN THE COMBUSTION CHAMBER TEMPERATURE AT OR ABOVE 1,500 DEGREES FAHRENHEIT, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE REPORT SHALL INCLUDE THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[RULE 1303(a)(1)-BACT, 3004(a)(4)-PERIODIC MONITORING, 40CFR PART 64]

6. A GAUGE SHALL BE INSTALLED TO INDICATE, IN INCHES OF WATER, THE STATIC PRESSURE DIFFERENTIAL ACROSS THE SPRAY BOOTH EXHAUST FILTERS. IN OPERATION, THE PRESSURE DIFFERENTIAL SHALL NOT EXCEED 0.25 INCH OF WATER.
[RULE 1303(a)(1)-BACT]
7. THIS EQUIPMENT SHALL OPERATE WITH A MINIMUM OVERALL CONTROL EFFICIENCY OF 95 % AND A MINIMUM DESTRUCTION EFFICIENCY OF 95 %.
[RULE 1303(a)(1)-BACT]
8. THE SPRAY BOOTH AND THE DRYING TUNNEL SHALL BE MAINTAINED AS PERMANENT TOTAL ENCLOSURES AS PER THE REQUIREMENTS OF EPA METHOD 204.
[RULE 1303(a)(1)-BACT]
9. THE TOTAL QUANTITY OF VOC EMITTED TO THE ATMOSPHERE FROM THIS EQUIPMENT SHALL NOT EXCEED 1320 LBS. IN ANY ONE MONTH. AN OVERALL CONTROL EFFICIENCY OF 95 % SHALL BE USED TO DETERMINE COMPLIANCE WITH THIS CONDITION.
[RULE 1303(b)(2)-OFFSET]
10. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1, WITH AN EFFECTIVE DATE OF MAY 3, 2002 OR EARLIER, EXCEPT FOR ETHYLENE GLYCOL MONOBUTYL ETHER (EGBE).
[RULE 1401]
11. THE OPERATOR SHALL KEEP ADEQUATE RECORDS TO VERIFY COMPLIANCE WITH CONDITIONS 5, 7, 8, 9 AND 10. THESE RECORDS SHALL BE RETAINED ON FILE FOR AT LEAST FIVE YEARS AND SHALL BE MADE



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AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.
[RULE 1303(b)(2)-OFFSET]

12. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD VOC EMISSIONS FOR THE MONTH FROM ALL EQUIPMENT AND OPERATIONS COVERED BY THE MONTHLY LIMIT. THE RECORD SHALL INCLUDE ANY PROCEDURES USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED AND CERTIFIED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES.
[RULE 1303(b)(2)-OFFSET]
13. THE OPERATOR SHALL MAINTAIN A SINGLE LIST, WHICH INCLUDES ONLY THE NAME, AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED VOC-CONTAINING MATERIAL REGULATED BY THE DISTRICT THAT WAS USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.
[RULE 1303(b)(2)-OFFSET]
14. THE OPERATOR SHALL RETAIN ALL PURCHASE INVOICES FOR ALL VOC-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL WASTE MANIFESTS FOR ALL VOC-CONTAINING WASTE MATERIAL REMOVED FROM THE FACILITY, FOR 60 MONTHS.
[RULE 1303(b)(2)-OFFSET]
15. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE RETAINED AT THE FACILITY FOR 60 MONTHS, AND SHALL BE MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST.
[RULE 1303(b)(2)-OFFSET]
16. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL CONDUCT SOURCE TESTS UNDER THE FOLLOWING CONDITIONS:
 - A. THIS SOURCE TEST SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
 - B. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES. THE TEST PROTOCOL SHALL INCLUDE THE COMPLETED DISTRICT FORMS ST-1 AND ST-2 SPECIFYING THE PROPOSED OPERATING CONDITIONS OF THE EQUIPMENT DURING THE TEST, THE IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING IT MEETS THE CRITERIA IN DISTRICT RULE 304(K), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.
 - C. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, TESTING AT THE INLET AND THE EXHAUST OF THE OXIDIZER FOR:
 1. VOLATILE ORGANIC COMPOUND (VOC) IN PPMV AND LBS/HR
 2. VOC DESTRUCTION EFFICIENCY
 3. VOC COLLECTION EFFICIENCY FOR EACH OF THE SPRAY BOOTH AND DRYING TUNNEL.
 4. USAGE OF ALL VOC-CONTAINING MATERIALS (COATINGS, SOLVENTS, ETC.) DURING THE TEST
 5. OXYGEN CONTENT
 6. MOISTURE CONTENT
 7. FLOW RATE FROM THE SPRAY BOOTH, THE DRYING TUNNEL, AND ANY OTHER EQUIPMENT THAT IS VENTED TO THE OXIDIZER.
 8. OUTLET FLOW RATES
 9. TEMPERATURE



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10. DEMONSTRATE THAT THE PTES MEET THE CRITERIA FOR PTE PURSUANT TO EPA METHOD 204.

- D. THE SOURCE TEST SHALL BE CONDUCTED WHILE THE OXIDIZER IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT MAY BE INCREASED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.

[RULE 1303(a)(1)-BACT]

17. IN ADDITION TO THE SOURCE TEST REQUIREMENTS SPECIFIED IN CONDITION NO. 16, THE OWNER OR OPERATOR SHALL COMPLY WITH THE FOLLOWING:

- A. A WRITTEN NOTICE OF THE SOURCE TESTS SHALL BE SUBMITTED TO THE DISTRICT AT LEAST 14 DAYS PRIOR TO THE SOURCE TESTING DATE SO THAT AN OBSERVER FROM THE DISTRICT MAY BE PRESENT.
- B. TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE SOURCE TESTING DATE. THE SOURCE TEST REPORT SHALL INCLUDE, BUT NOT BE LIMITED TO ALL TESTING DATA REQUIRED BY THIS PERMIT.
- C. A TESTING LABORATORY CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR CRITERIA POLLUTANTS TO BE MEASURED, AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST) SHALL CONDUCT THE TESTS.
- D. SAMPLING FACILITIES SHALL COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217.

[RULE 1303(a)(1)-BACT]

Periodic Monitoring:

18. THE OPERATOR SHALL DETERMINE AND RECORD THE PRESSURE DROP ACROSS THE FILTER MEDIA ONCE EVERY WEEK.

[RULE 3004 (a)(4)]

19. THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA AND IMPROPERLY INSTALLED FILTER MEDIA. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

- A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
- B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
- C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.

[RULE 3004 (a)(4)]

20. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

- A. THE TEST SHALL BE CONDUCTED AT LEAST ONCE DURING THE LIFE OF THE PERMIT.
- B. THE TEST SHALL BE CONDUCTED NO LATER THAN FEBRUARY 4, 2011 UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE OFFICE

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- C. THE TEST SHALL BE CONDUCTED TO DETERMINE THE VOC EMISSIONS USING AN APPROVED DISTRICT METHOD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE PERMIT CONDITION(S), RULES AND REGULATIONS.
- D. THE SOURCE TEST SHALL BE CONDUCTED WHILE THE OXIDIZER IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT MAY BE INCREASED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.
- E. THE OPERATOR SHALL COMPLY WITH ADMINISTRATIVE CONDITIONS NOs. 8, 9, AND 10 OF SECTION E OF THIS FACILITY PERMIT.
- F. THE OPERATOR SHALL SUBMIT TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SPECIFIED IN CONDITION NO. 9 OF SECTION E OF THIS FACILITY PERMIT TO THE DISTRICT ENGINEERING AND COMPLIANCE DIVISION. THE ENGINEERING COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, COATING, PRINTING AND AEROSPACE OPERATIONS, ATTN: AIR QUALITY AND COMPLIANCE SUPERVISOR, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765. THE COMPLIANCE COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, P.O. BOX 4941, DIAMOND BAR, CA 91765

[RULE 3004(a)(4)]

Emissions and Requirements:

- 21. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 109
VOC: RULE 1125, SEE APPENDIX B FOR EMISSION LIMITS
VOC: RULE 1145, SEE APPENDIX B FOR EMISSION LIMITS
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
PM: RULE 481